

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:18 CR 682
Plaintiff	)	HON. DAN A. POLSTER
-vs-	)	
TAMIKO PARKER,	)	<b><u>MOTION FOR CONTINUANCE</u></b>
Defendant	)	<b><u>OF SENTENCING</u></b>

Now comes the Defendant, Tamiko Parker, by and through the undersigned counsel and hereby moves this Honorable Court for a continuance of the sentencing date herein, which is presently set for **September 10, 2020**.

As grounds herefor, the undersigned counsel submits the following:

1. Due to the continuing pandemic this Honorable court as well as many others have implemented procedures to limit person-to-person contact. One of these measures has been the use of “zoom” or other similar video appearance mediums. The Defendant as well as the undersigned counsel greatly appreciate efforts made by the Court to accommodate the interests of all parties in moving cases forward. However, counsel (and Defendant) believe that while the video process may be adequate for some proceedings, it is not necessarily so for others. It is respectfully suggested that a sentencing hearing where liberty is on the line is one of those proceedings. For this reason the Defendant does not consent to sentencing without personally appearing before this Honorable Court. It is believed that the appearance of the defendant and counsel can be done in such manner to be safe for all parties.

2. The present case involves sentencing issues which may require reference to documents by counsel and client during the course of the hearing which would be difficult in a video context.
3. While Ms. Parker desires to appear before this Court face-to-face, she has no objection to any other parties appearing via video.

**WHEREFORE**, a continuance to a date convenient to the Court is respectfully requested

Respectfully submitted,

/s/ Robert A. Dixon

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**CERTIFICATE OF SERVICE**

This document was filed via the ECF system for the U.S. District Court for the Northern District of Ohio and served upon all parties by operation of that system, this 8<sup>th</sup> day of September, 2020.

/s/ Robert A. Dixon

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